

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
Executive Director

Southern District of New York
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June 2, 2023

VIA ECF

REQUEST GRANTED.

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

6/5/2023 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

**Re: United States v. Moises Disla Ramos
22 Cr. 431 (LJL)**

Dear Judge Liman:

We write, as counsel to Moises Disla Ramos, to respectfully request an extension of time to submit a briefing schedule in connection with the motion to suppress the contents of Mr. Disla Ramos' cellphone, which the government produced on May 1, 2023. The Court previously ordered that a briefing schedule be submitted by June 5, 2023. *See* March 2, 2023 Minute Entry.

The request for an extension of time is two-fold. First, the contents of Mr. Disla Ramos' phone are primarily in Spanish, and thus, additional time is requested to have these materials translated. Second, the parties are engaged in plea negotiations, and if an agreement is reached, there would be no need for the suppression motion. Accordingly, we request that, in lieu of submitting a briefing schedule on June 5, 2023, the parties could set a briefing schedule, if necessary, at the status conference scheduled for June 13, 2023. The government has no objection to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Kristoff I. Williams, Esq.
Marne L. Lenox, Esq.
Counsel for Moises Disla Ramos

cc: Counsel of record

Hon. Lewis J. Liman

SO ORDERED:

THE HONORABLE LEWIS J. LIMAN
United States District Judge